

Message

From: Adams, Glenn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C79E328CD4484265B012DFA81663F5E7-ADAMS, GLENN]
Sent: 4/26/2021 8:58:40 PM
To: Randall Chaffins [Chaffins.Randall@epa.gov]
Subject: FW: for the discussion regarding the administrator's ORR discision

Importance: High

I just wanted to share the concerns Cathy has about getting to an approvable final ROD. I agree with these concerns, but our plan is to get them resolved at the EIT and/or project team level. After this afternoon's call I thought you might want to see these though. I agree with what you said, we will get to a health protective solution for this issue.

Points 1 and 2, R4's positions are specifically stated in the decision. Point 3 is mentioned in the decision, but not specific enough for us to use. Point 4 is the dilution issue that we have discussed before and as you stated today might mean DOE has to run a pipe.

From: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Sent: Monday, April 26, 2021 9:59 AM
To: Adams, Glenn <Adams.Glenn@epa.gov>
Subject: for the discussion regarding the administrator's ORR discision
Importance: High

ORR Administrator's decision:

1. Submittal of the revised FFS. Seems to be some reluctance on DOE's part to revise the FFS. R4 position: approved revised FFS is needed prior to approval of the EMDF ROD.
2. Inclusion of specific effluent limits for radionuclides in the EMDF ROD: DOE has suggested omitting the specific effluent limits for radionuclides in the ROD, and following with a post-ROD modification. R4 position: effluent limits for radionuclides should be specified in the ROD.
3. Public outreach. DOE has agreed to providing additional information to the public regarding several topics that were not described in the 2018 Proposed Plan. DOE is not planning to revise the Proposal Plan and are not planning to solicit formal public comment with associated responsiveness summary. Additional information will be provided via video, virtual public information sessions, etc. DOE has not set a scheduled for public information activities, and has not committed to completing the activities prior to finalizing the EMDF ROD. R4 position: information sessions, including opportunity for Q&A, should be conducted prior to finalizing the ROD.
4. Development of effluent limits for radionuclides: The project team is developing instream water quality levels for radionuclides, using site specific consumption rates for recreational fishing (rather than CWA guidance defaults), per the decision. However, DOE believes the resulting water quality levels will only apply to the area of Bear Creek that may reasonably be expected to be fished, rather than to the entire creek. Therefore, in extrapolating from an instream water quality level to an effluent limit at the EMWMF, the DOE wants to account for the several kilometer distance from the effluent outfall to the "fishing hole" by applying a dilution factor. This is contrary to the way chemical AWQC and effluent limits are set, and would result in no instream standards for the creek except for the portion of the creek identified as the place of reasonable maximum exposure ('fishing hole'). R4 position: the site-specific instream water quality level should be applied to the entire creek, and the effluent limit developed accordingly, similar to the method applied by the CWA for chemicals.

Cathy Amoroso, Chief
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